

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

THE NOCO COMPANY)	CASE NO. 1:20-cv-02322
)	
Plaintiff,)	JUDGE DAVID A. RUIZ
)	
v.)	
)	
AUKEY TECHNOLOGY CO. LTD., et)	
al.,)	
)	
Defendants.)	

JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER

Plaintiff The NOCO Company ("*NOCO*") and Defendants Aukey Technology Co., Ltd. ("*Aukey*"), Shenzhenshi Jaingyun Shangmaoyouxiangongsi ("*HuiMing*"), and Wodeshijikeji Shenzhen Youxiangongsi ("*WorldUS*") (together, the "*Defendants*") (with NOCO, the "*Parties*") jointly move the Court for an entry of the agreed upon proposed Stipulated Protective Order attached hereto as Exhibit 1. The Parties submit that good cause exists for the entry of the proposed Stipulated Protective Order. The Stipulated Protective Order is necessary to safeguard the confidentiality of trade secrets and other sensitive technical and business information that the Parties, and certain non-parties that may be subject to a subpoena, may be asked to produce in connection with this litigation. For the Court's convenience, a red-lined version of the Parties' proposed Stipulated Protective Order

demonstrating the changes relative to the Court's Model Protective Order is attached hereto as Exhibit 2. In further support of this Motion, the Parties state as follows:

1. NOCO initiated this action on October 13, 2020, and subsequently moved for a temporary and preliminary injunction, which was denied. (*See* ECF ## 1, 23). After service of the Complaint, Defendants filed their Fed. R. Civ. P. 12(a) response on July 29, 2021. (*See* ECF # 26).

2. Federal Rule of Civil Procedure 26(c) permits district courts, upon good cause, to make an order to protect a party or person from annoyance, embarrassment, oppression, or undue burden or expense. Fed. R. Civ. P. 26(c).

3. Good cause exists here for entry of the proposed Stipulated Protective Order attached as Exhibit 1. The Stipulated Protective Order is necessary to safeguard the confidentiality of trade secrets and other sensitive technical and business information that the Parties or non-parties may be asked to produce in connection with this action

4. The Stipulated Protective Order proposed by the Parties contains two tiers of protection for Confidential Information, identified in the proposed Order as "CONFIDENTIAL-SUBJECT TO PROTECTIVE ORDER" and "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY – SUBJECT TO PROTECTIVE ORDER."

5. Both tiers of protection are designed to safeguard sensitive information, the disclosure of which it is believed would cause competitive injury to the producing party.

6. The Parties jointly respectfully request entry by the Court of the agreed upon proposed Stipulated Protective Order attached as Exhibit 1.

Respectfully Submitted,

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Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was filed electronically via the Court's electronic docketing system on August 10, 2022. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

/s/ Jon J. Pinney

Jon J. Pinney

Counsel for Plaintiff The NOCO Company